

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
Case No.: 7:23-CV-897**

IN RE:

CAMP LEJEUNE WATER LITIGATION

This Document Relates to:

ALL CASES

**JOINT MOTION FOR EXTENSION TO SUBMIT PROPOSALS FOR SETTLEMENT  
MASTER**

The Plaintiffs' Leadership Group ("PLG") and Defendant United States of America jointly move this Court to extend the deadline to submit proposals to the Court for its appointment of a Settlement Master. In a text Order on December 11, 2023, the Court stated: "[W]here counsel appears to be contemplating the appointment of a Settlement Master in these cases, the Court requests counsel submit names of individuals to be considered for such appointment. Counsel may include these in either of the aforementioned status reports," due December 19, 2023 and January 2, 2024. The PLG has solicited recommendations from among the leadership group and is actively evaluating several candidates. The Defendant has received a recommendation from the U.S. Attorney's office. The parties request that the Court grant the parties an additional two weeks, until January 16, 2024, to assess candidates, exchange names with each other, and attempt to reach agreement on submissions to the Court. The parties continue to make progress on the Settlement Questionnaire, and the short extension requested here will not adversely affect any work being done by the parties. While there are certain questions that remain open and that a Settlement Master

could help resolve, leaving those questions open for the time being will not prevent the parties from continuing to move forward on other parts of the questionnaire. Therefore, the extension requested will have no impact on the overall timeline for the completion of the Settlement Questionnaire.

WHEREFORE, the parties respectfully request an extension of the deadline to submit proposals to the Court for its appointment of a Settlement Master until January 16, 2024.

*[Signature Pages Follow]*

Respectfully submitted, this 29<sup>th</sup> day of January, 2023.

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